

6823 MRS/PJS

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PATRICK PURSLEY

Plaintiff,

v.

WARDEN TARRY WILLIAMS, ILLINOIS  
DEPARTMENT OF CORRECTIONS,  
SALVADORE GODINEZ, DOCTOR SALEH  
OBAYSE, KEVIN HOLLARAN (CEO  
WEXFORD HEALTH SOURCES),

Defendants.

Case No. 15 CV 4313

Hon. Judge Virginia M. Kendall

**UNOPPOSED MOTION FOR ENTRY OF  
GENERAL CONFIDENTIALITY/PROTECTIVE ORDER**

NOW COMES the Defendant, WEXFORD HEALTH SOURCES, INC. (“Wexford”), by and through its attorneys, CUNNINGHAM, MEYER & VEDRINE, P.C., and hereby moves for entry of an agreed General Confidentiality/Protective Order in this matter:

1. Plaintiff, a former inmate who was in the custody of the Illinois Department of Corrections, has filed a case alleging deliberate indifference in the provision of his medical care. In connection with that lawsuit, the production and disclosure of sensitive documents will likely be required.

2. Given the sensitive nature of the potential documents that will be sought, Defendant Wexford requests that a General Confidentiality / Protective Order be entered to cover the production of such documents.

3. Counsel for Plaintiff participated in the drafting of the proposed protective order, and does not oppose the instant motion seeking entry of that proposed order.

6. Pursuant to this Court's case procedures, a copy of the proposed order will be submitted to this Court's proposed order inbox (Proposed\_Order\_Kendall@ilnd.uscourts.gov). Counsel for all other parties will be copied on that email.

WHEREFORE, Defendant Wexford respectfully requests that this Honorable Court enter the agreed proposed General Confidentiality/Protective Order in this matter.

Respectfully submitted,

CUNNINGHAM, MEYER & VEDRINE, P.C.

/s/ Terry S. Lu

Terry S. Lu (ARDC #6313383)

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